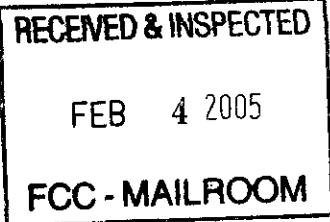


Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DUPLICATE



In re

Amendment of Sections 73.21)
and 73.37 of the Commission's) RM No. 11136
Rules to Provide for Facilities)
Changes by Stations Operating)
in the Expanded AM Band)
(1605-1705 kHz))

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To: Media Bureau

COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

Mortenson Broadcasting Company, licensee of AM station KKGM, operating on 1630 kHz at Ft. Worth, Texas, Facility ID No. 87147 (hereinafter KKGM), hereby submits these comments in support of the pending petition to amend the Commission's rules to allow certain changes in the facilities of AM stations operating above 1600 kHz.¹

KKGM has reviewed petitioners' comments dated February 1, 2005, and agrees with them. In these comments, KKGM brings to the Commission's attention additional reasons to support the proposed amendments to its rules.

KKGM operates with the standard facilities authorized to expanded band stations, 10 kW during the day and 1 kw at night, nondirectional. However, as shown in the comments of the petitioners, the coverage achieved with this power is the same that would be achieved from a station operating at 540 kHz with only 60 Watts. This difference is due solely to the fact that AM

¹ The petition was filed jointly by three licensees. For brevity, they will be referred to herein as "petitioners."

coverage is strongly frequency dependent. The higher the frequency, the greater the signal attenuation.

In the AM band below 1610 kHz, the Commission recognizes this fact by granting stations authority to operate with as much power as possible, up to 50 kW, without resulting in interference. Thus, stations on high frequencies often may operate with greater power than a similarly-situated stations operating on low frequencies. In this way, the coverage areas of the stations may be somewhat equalized.

In the case of television, the Commission has recognized that signals at different frequencies propagate differently. UHF stations are allowed considerably more power than their VHF counterparts, because the higher frequencies do not propagate nearly as well as do the lower frequencies. The situation with expanded band AM stations is analogous. It is only reasonable for the Commission to take the reduced propagation characteristics of expanded band stations into account in determining allowable transmitter power levels. By granting the pending petition and amending its rules, the Commission will serve the public interest by increasing the number of listeners expanded band stations may serve, without causing any detriment. As Petitioners stated in their comments, this is a win-win situation.

KKGM operates within the Dallas-Ft. Worth market. As defined by Arbitron, this market consists of a number of cities and counties: Collin, Dallas, Denton, Ellis, Hood ,Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise. With the limited power now

available to it, KKGM does not cover this vast market in the way other stations may.² KKGM must compete with other AM stations in the market, many of which operate on much lower frequencies, and/or at the maximum power of 50 kW.³

A few of the Dallas-Ft. Worth AM stations which are licensed to the lower part of the AM band include KAAM, 770 kHz; KRLD, 1080 kHz; KSKY 660 kHz; KLIF, 570 kHz; and WBAP, 820 kHz. It is unreasonable to arbitrarily restrict KKGM's power in the face of such competition when allowing an increase does no harm.

Accordingly, KKGM fully supports the proposal to allow expanded band AM stations to improve their facilities.

Respectfully submitted,

Mortenson Broadcasting Company

By 
Jerrold Miller
Its Attorney

February 3, 2005

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² As the Commission now utilizes a market definition for multiple ownership concerns, it is appropriate to adopt the same definition in considering a station's coverage needs.

³ This does not even consider the number of high power (Class C) FM stations in the market.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2005, a copy of the foregoing document was placed in the United States mail, first class postage prepaid, addressed to the following:

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